

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

Plaintiff,

-against-

SEAN COMBS, JUSTIN DIOR COMBS, ETHIOPIA
HABTEMARIAM, LUCIAN CHARLES GRAINGE,
KRISTINA KHORRAM, CHALICE RECORDING
STUDIOS, LOVE RECORDS, MOTOWN RECORDS,
UNIVERSAL MUSIC GROUP, COMBS GLOBAL
ENTERPRISES, JOHN and JANE DOES 1-10 and ABC
CORPORATIONS. 1-10,

Defendants.

Case No.: 24-cv-01457

**WAIVER OF SERVICE OF
SUMMONS BY UNIVERSAL
MUSIC GROUP (UMG
RECORDINGS, INC.)**

TO: Tyrone A. Blackburn, Esq. (counsel for Plaintiff, Mr. Rodney Jones)

PLEASE TAKE NOTICE THAT:

Notwithstanding the failure by Plaintiff in the above-captioned action either to attempt service of process or to request waiver of service of process pursuant to Fed. R. Civ. P. 4(d), Defendant UMG Recordings, Inc. (incorrectly identified in the First Amended Complaint as Universal Music Group, which is not a juridical entity but merely a short-hand reference to various companies within UMG Recordings, Inc.) ("UMG") and its counsel, Pryor Cashman LLP, hereby agree to waive service of process in this Action to save the time and expense of requiring the Plaintiff to serve a summons and complaint in this Action in accordance with Rule 4(d) of the Federal Rules of Civil Procedure.

Accordingly, UMG waives any objections to the absence of the issuance of a summons or service of the summons and complaint, but hereby expressly reserves and does not waive any

and all defenses and objections at law or in equity, other than as to service of process, including without limitation as to the lawsuit, the Court's jurisdiction, and the venue of this Action.

UMG understands that it must file and serve an answer or a motion under Rule 12 within the applicable timeframe provided for in Rule 4(d)(3) and intends to respond to the First Amended Complaint in this Action promptly.

Dated: New York, New York
March 27, 2024

PRYOR CASHMAN LLP

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